

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
DANIEL SZAROLETA,

Plaintiff,

PROPOSED VOIR  
DIRE QUESTIONS

- against -

07 Civ. 7639 (DLC)

METRO-NORTH COMMUTER RAILROAD ,

Defendant.

-----X

1. What is your business or occupation?
2. By whom are you employed and how long have you been so employed?
3. If you are retired, what was your previous employment?
4. Are you married or do you reside with someone? If so, what is their employment?
5. What is your educational background?
6. Do you have any children? What ages? Are any of them employed? If so, as what and by whom?
7. Have you, any member of your family, or close relative, ever been diagnosed with a back condition or injury?
8. Have you, any member of your family, or close relative, ever lost time from work or required medical attention because of an injury to your back?
9. Would your experience by reason of same, affect your ability to be fair and impartial in this case?
10. Have you ever been a party or a witness in a lawsuit? If yes, give details.

11. If a party to a lawsuit, was the case settled before trial or was there a trial?
12. If a party to a lawsuit, were you satisfied with the results?
13. Would that lawsuit experience affect your ability to be a fair or impartial juror in this case?
14. Have you ever sat as a juror in the federal or state court prior to this? If so, was it a civil or criminal action?
15. Did the case(s) go to a verdict? Did you participate in the deliberations?
16. Is it your opinion that the verdict rendered was a fair and just verdict?

Dated: New York, New York

April 23, 2008

Respectfully submitted,

RICHARD K. BERNARD  
GENERAL COUNSEL

By: S/

José R. Rios  
Attorneys for Defendant  
347 Madison Avenue  
New York, N.Y. 10017  
(212) 340-2537 - JRR/5785

TO: Marc Wietzke, Esq.  
Law Offices of Michael Flynn, P.C.  
Attorneys for Plaintiff  
1205 Franklin Avenue, Suite 250  
Garden City, NY 11530

**STATE OF NEW YORK }  
                        }  
                        } ss:  
**COUNTY OF NEW YORK}****

Laura Matthews, being duly sworn, deposes and says:

I am not a party to the action, am over 18 years of age and reside in the Bronx, New York.

On April 23, 2008, I served a true copy of the annexed PROPOSED VOIR DIRE QUESTIONS, and DEFENDANT'S CHARGE REQUESTS mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

TO: Marc Wietzke, Esq.  
Law Offices of Michael Flynn, P.C.  
Attorneys for Plaintiff  
1205 Franklin Avenue, Suite 250  
Garden City, NY 11530

S/  
Laura Matthews

Sworn to before me this

23 day of April, 2008

S/  
Notary Public